

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:
	:
Debtors.	:
	:
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**Chapter 11 Case No.
08-13555 (JMP)
(Jointly Administered)**

SUPPLEMENTAL AFFIDAVIT AND DISCLOSURE STATEMENT OF CORNELIUS

MALCOLM MEDVEI

ON BEHALF OF EVERSHEDS LLP

I, Cornelius Malcolm Medvei of One Wood Street, London, EC2V 7WS says as follows:

1. I am a Member of Eversheds LLP, One Wood Street, London, EC2V 7WS (the "Firm").
2. On 24th August 2009, I executed an Affidavit and Disclosure Statement (the "Affidavit") in support of Lehman Brothers Holdings Inc. and its affiliated debtors (together, the "Debtors") retention of Eversheds LLP as ordinary course professionals to provide legal services to the Debtors in relation to real estate, litigation, restructuring, corporate and commercial matters (collectively, the "Representative Matters") and submitted that Affidavit and a completed Retention Questionnaire (the "Questionnaire") to the Debtors' bankruptcy counsel, to be filed with the Court in accordance with the procedures set forth in the amended order entered March 25, 2010 authorizing the Debtors to employ professionals utilized in the ordinary course of business [Docket No. 7822]. The Debtors subsequently filed the Affidavit and Questionnaire with the Court on September 9, 2009 [Docket No. 5112].
3. This affidavit supplements the previous Affidavit and states that Eversheds LLP, through its Hong Kong office of 21/F, Gloucester Tower, The Landmark, 15 Queen's Road Central, Hong Kong, Peoples Republic of China, is proposing to act for the Liquidators of Lehman Hong Kong entities - which include, among others, Lehman Brothers Commercial Corporation Asia Limited (LBCCA), Lehman Brothers Asia Capital Company Limited (LBACC), Lehman Brothers Asia Holdings Limited (LBAH), Lehman Brothers Asia Limited (LBA), Lehman Brothers Futures Asia Limited (LBFA), Lehman Brothers Securities Asia Limited (LBSA), Lehman Brothers Nominees (H.K.) Limited and LBQ Hong Kong Funding Limited. In addition, Eversheds LLP may also represent the Liquidators of Lehman Brothers Equity Finance (Cayman) Limited, a Cayman company in liquidation. and the Liquidators of Lehman Brothers Netherlands Horizons BV (LBNH), a Dutch company. The scope of work for the above Lehman entities is expected to cover representation of the above Lehman entities in relation to intercompany positions with other Lehman affiliates (including LBHI and other Lehman affiliates in the US).

4. The proposed representations are not adverse to the Debtors with respect to the Representative Matters for which the Firm has already been retained. It may be necessary for Eversheds' lawyers based in other office in their network to advise on these matters. However, should advice be required to be given on such matters from an office where lawyers advising the Debtors are based, and to avoid even the appearance of impropriety resulting from such representations, the Firm will be implementing certain safeguards, including, establishing an ethical wall between those lawyers working on the Representative Matters and those engaged in the above detailed representations, and not to undertake representations against the Debtors (and their non-debtor affiliates other than Lehman Brothers Inc. and those foreign affiliates that are the subject of non-US insolvency proceedings and are under the control of administrators, liquidators or trustees) other than with respect to the representations disclosed herein, without first obtaining a separate conflict waiver related to such additional representations from the Debtors.

5. Furthermore, through their London office, Eversheds LLP will act for Dr Michael Frege, the insolvency administrator of Lehman Brothers Bankhaus A.G. (LBB). Whilst Eversheds has not to date been instructed to act in relation to any claim by LBB against LBHI or other Lehman affiliates in the US, and we do not currently anticipate receiving any such instructions, it is possible that we will be so instructed in the future. Providing such services to LBB will not be adverse to the Debtors with respect to the Representative Matters for which the Firm has already been retained. In the event that we are instructed to act in relation to any claim by LBB against LBHI or other Lehman affiliates in the US, so that advice is given from an office where lawyers advising the Debtors are based, appropriate procedural safeguards similar to those described above will be put in place.

By: the above named **CORNELIUS MALCOLM MEDVEI**

described and sworn to before me

23rd day of March, 2011 at London, England

Victoria G
Notary Public

Medvei